

Morgan Lewis

Application Granted.

Gregory T. Parks
Partner
+1.215.963.5170
gregory.parks@morganlewis.com

March 5, 2020

So Ordered:


P. Kevin Castel
United States District Judge

3/9/2020

Judge P. Kevin Castel
500 Pearl St., Courtroom 11D
New York, NY 10007-1312

Re: Arkansas Federal Credit Union, et al. v. Hudson's Bay, et al.
Case No. 1:19-cv-4492 (PKC) (S.D.N.Y.) [Rel. 1:18-cv-08472-PKC]

Dear Judge Castel:

We represent Defendants Hudson's Bay Company, Saks Fifth Avenue LLC, Saks & Company LLC, Saks Incorporated, and Lord & Taylor LLC ("Defendants") in the above-referenced action. We are writing to inform the Court that the parties will be participating in a mediation before the Honorable Diane M. Welsh (Ret.) on March 19, 2020.¹ In light of the scheduled mediation, and pursuant to Rules 1(A) and (B) of Your Honor's Individual Practices in Civil Cases, we write with consent of counsel for Plaintiffs Arkansas Federal Credit Union and The Summit Federal Credit Union ("Plaintiffs") to respectfully request an extension of Defendants' deadline to respond to Plaintiffs' Second Amended Complaint, which is currently due four (4) days before the scheduled mediation, on March 15, 2020. [Defendants are hopeful that the mediation will obviate the need to file a response, but in the event that it does not, Defendants respectfully request that the deadline to respond to the Second Amended Complaint be extended to May 1, 2020.] There are no upcoming conferences scheduled before the Court in this matter.

Plaintiffs graciously consented to this request. There have been no previous requests to extend this deadline and, if approved, the requested extension will not affect any other scheduled dates.

Respectfully,

/s/ *Gregory T. Parks*

Gregory T. Parks

cc: All counsel of record (via ECF)

¹ The parties to the related consumer action, *In re Hudson's Bay Company Data Security Incident Consumer Litigation*, No. 1:18-cv-8472, will be participating in a mediation before Judge Welsh on March 11, 2020.

Morgan, Lewis & Bockius LLP

1701 Market Street
Philadelphia, PA 19103-2921
United States

 +1.215.963.5000
 +1.215.963.5001